BRACH EICHLER L.L.C.

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Defendant.

UNITED STATES DISTRICT COURT FOR THE DISTRICT OF NEW JERSEY

THE SPINE AND SPORTS HEALTH
CENTER AND RON BEN-MEIR, D.O.,

Plaintiffs,

CONSENT ORDER

V.

ALEXANDRU BURDUCEA, D.O. AND
JOHN DOES 1-5,

On October 15, 2018, Plaintiffs The Spine and Sports Health Center and Ron Ben-Meir, D.O. filed a Complaint seeking, inter alia, the removal of false and defamatory content from the Internet, including from Google. The content Plaintiffs seek to have removed from Google is as

| Approx. Date Posted | Google Account/ Screen Name | Post Content | Post URL |
|---------------------|--------------------------------------|--|--|
| 09/27/2018 | Jennifer Jackson | Dr. Ben-Meir did 1 injection and I will not go back for the 2 nd . I had horrible pain for weeks and could not walk well at all. I called the office to talk to him and he did not call me back in 1 week. I felt very u [sic] safe under his care. This practice is not good. Dr. Ben-Meir is not ethically correct and mistreated me. I am an old lady in pain. I should not have suffered this way. I would NOT recommend him to anyone!!! | https://www.google.com/map s/contrib/1102627360130648 56694/reviews/@40.7469456 74.0380055,17z/data=!3m1!4 b1!4m3!8m2!3m1!1e1?hl=en -US |

follows:

| Approx. Date Posted | Google Account/ Screen Name | Post Content | Post URL |
|----------------------|--------------------------------------|---|--|
| 09/27/2018 | J Cortes | My KNEE got INFECTED after he injected it and I had to go the ER. I was on antibiotics for 2 weeks. HE NEVER CALLED TO CHECK [SIC] ON ME AFTER THE INJECTION. Dr. Ben-Meir had a very dirty technique and used non-sterile gloves. I am not going back to him. He caused me so much agony and pain after a simple injection. | https://www.google.com/map s/contrib/1085484452725593 14370/reviews?hl=en- US&sa=X&ved=2ahUKEwi Yj6Pl7JXfAhXiYt8KHeWR DAIQvvQBegQIARA4 |
| 10/01/2018 | A Rodriguez | Ben Meir treated me with injections that did not help at all. There was no improvement at all and he still kept on insisting to inject more. My sugar got very high and I gained so much weight. My family doctor called him and told him to stop injecting me with so much steroids. He treated me like a | https://www.google.com/maps/contrib/102654776892085322057/reviews?hl=en-US&sa=X&ved=2ahUKEwj0lb2L7JXfAhUJZd8KHQG6D3kQvvQBegQIARAT |
| | | 'PINCUSHION' I would not recommend him to anyone | |
| 10/01/2018 | A Wilson | Dr Ben Meir made me very uncomfortable since he examined me in the room WITHOUT a nurse. This was below a standard of care exam. since I am a retired nurse, I can tell HE is not trustworthy. He should not examine female patients without a nurse in the room. I am very upset with this bedside manner. | https://www.google.com/maps /contrib/112591743103588733 414/reviews/@40.7469456,- 74.0380055,17z/data=!3m1!4b 1!4m3!8m2!3m1!1e1?hl=en- US |
| 10/02/2018 | George Storm | Dr Ben Meir staff lost my mri and emg results. They blamed me for it. The doctor was rude and very short and unprofessional with me. I wasted weeks to go back to the mri facility to get the results and saw the doctor again. He was useless. He said he can not help me and he does not treat fibromyalgia after I wasted 2 months to see him, he was no help. What kind of doctor is this? Disappointing experience | https://www.google.com/map s/contrib/1033697195918001 28244/reviews?hl=en- US&sa=X&ved=2ahUKEwj8 leLT7JXfAhVQT98KHTJCB DoQvvQBegQIARA |

| Approx. Date Posted | Google Account/ Screen Name | Post Content | Post URL |
|---------------------|--------------------------------------|--|--|
| 10/04/2018 | H Cohen | I suffer with back and knee pain and I was treated by him for a whole. I had no results and he wanted to do more and more injections which were not helping. He injected so much steroid that my family doctor got upset. I gained weight and my sugar was high. It was not a good experience. Very pushy doctor | https://www.google.com/map s/contrib/1002407608333001 18483/reviews/@40.7469456, - 74.0380055,17z/data=!3m1!4 b1!4m3!8m2!3m1!1e1?hl=en -US |
| 10/5/2018 | A Smith | The office staff is fine but the doctor is not that good. He could not help me w my muscle pain. | https://www.google.com/map s/contrib/1104466924688840 84222/reviews?hl=en- US&sa=X&ved=2ahUKEwid r4Le7JXfAhWhdN8KHf4jAa sQvvQBegQIARBH |
| 10/6/2018 | Ali Wilson | Thr [sic] Doctor was not helpful. I transferred my care from LA and I was disappointed with Dr Ben Meir. He was in a rush and did not explain the plan. The physical exam was a 2 min thing. The staff is excellent and very helpful It was easy to make an appointment | https://www.google.com/map s/contrib/1068658542754813 90827/reviews/@40.7469456 274.0380055,17z/data=!3m1!4 b1!4m3!8m2!3m1!1e1?hl=en -US |
| 10/06/2018 | A George | Dr Ben Meir spent no time with me and the time was in the room he made me feel so uncomfortable. I am a young female and I felt strange the way he was looking at me. very unprofessional. The office staff was nice | https://www.google.com/maps/contrib/103468446905155183 902/reviews/@40.7469456,-74.0380055,17z/data=!4m3!8 m2!3m1!1e1?hl=en-US |
| 10/07/2018 | John Jordan | Below average doctor. Always in a rush. suffer with hip pain and after he injected me, he said I need surgey [sic] The staff is good and kind. | https://www.google.com/maps/contrib/109365533810010237930/reviews?hl=en-US&sa=X&ved=2ahUKEwjmga2k7ZXfAhUpUt8KHXBOB5QQvvQBegQIARAL |
| 10/08/2018 | Ana Matthews | I pulled my back at the gym and got an appointment with Dr Ben Meir. The staff was great. The doctor made a move on me, very flirtatious. He was not professional and asked me if I have a boyfriend. I am not going back to see him. | https://www.google.com/maps/contrib/103587542178021041201/reviews/@40.7469456,-74.0380055,17z/data=!3m1!4b1!4m3!8m2!3m1!1e1?hl=en-US |

From in or about August 2018 through in or about October 2018, the above-listed Google accounts were created on computers and/or devices owned by Defendant Alexandru Burducea, D.O. ("Defendant"), and the above-listed content was posted to those Google accounts.

Defendant wishes to remove the above-listed postings but lacks the capacity to do so. Defendant seeks for Google to remove the above-listed postings on Defendant's behalf.

IT IS on this _____ day of December 2018, ORDERED that:

- The above-listed content shall be removed immediately from Google;
- 2. Defendant shall immediately request from Google the removal of the above-listed content.

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| J.S.D.J. |
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